

LUCY L. THOMSON

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VIA ECF

The Honorable Martin Glenn
Chief Bankruptcy Judge
United States Bankruptcy Court for the Southern District of New York
One Bowling Green
New York, NY 10004-1415
mg.chambers@nysb.uscourts.gov

Re: *In re Celsius Network LLC, et al.*, Case No. 22-10964 (MG) – Request to Testify
in Chapter 11 Plan Confirmation Hearing

Dear Chief Judge Glenn:

As the Consumer Privacy Ombudsman appointed in this case, I am writing pursuant to paragraph 6 of the Order Establishing Case Management Procedures for the Confirmation Hearing [Dkt. No. 3478] to request an opportunity to testify at the Chapter 11 Plan Confirmation Hearing.

The amount of time requested is **15 minutes**.

By separate letter, I have requested to testify and to be available for cross examination and re-direct examination remotely.

My testimony will address the privacy issues in the case and the urgent need for the Debtors and the parties to advise the Court concerning the specific steps that will be taken by NewCo and Celsius in the Wind Down phase to protect the vast amount of personal and financial data of the 1.7 million Celsius account holders.

Sincerely,

/s/ *Lucy L. Thomson*

Lucy L. Thomson
Consumer Privacy Ombudsman

Attachment – Chapter 11 Confirmation Hearing Testimony